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November 14, 2012

By Facsimile

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
500 Pearl Street, Room 920
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 11/19/12

Re: Robert Bagley v. JPMorgan Chase & Co.
10 Civ. No. 1592 (PGG)(RLE)

Dear Judge Gardephe:

We represent the plaintiff, Robert Bagley, in the above-captioned action. It has come to our attention that certain exhibits attached to plaintiff's summary judgment opposition papers were inadvertently filed electronically. These exhibits contain sensitive information, including social security numbers, dates of birth, and home addresses, that should have been redacted pursuant to Fed. R. Civ. P. 5.2 and SDNY ECF Rules & Instructions § 21.3. (See Dkts. 36-3, 36-4, 36-5, 36-6, 36-93)¹

We spoke with the Southern District Electronic Case Filing ("ECF") Help Desk and were advised that we need an order from the Court to remove the materials from ECF. We therefore respectfully request that the Court direct that the mistaken filings be removed from ECF and formally sealed. In addition, we respectfully request permission to electronically file a redacted version of the mistaken filings. Defendant consents to our request.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.
Nov. 16, 2012

Respectfully submitted,

Milton L. Williams Jr.
Milton L. Williams, Jr.

MLW:ji

cc: Robert Whitman, Esq. (by email)

¹ Due to a filing error, the parties filed their summary judgment papers twice. As a result the same problems discussed above regarding Docket Entry No. 36 apply to Docket Entry No. 47.